

EXHIBIT 3B

7500 Rialto Blvd., Bldg. 1, Ste. 250
Austin, Texas 78735
United States

INVOICE

Invoice # 62
Date: 08/08/2022
Due On: 09/07/2022

Rodney Mahan

00033-Mahan

DPS Whistleblower Case

Type	Date	Notes	Quantity	Rate	Total
Service	03/30/2022	Conduct in-depth review of pleadings and MSJ response.	0.85	\$325.00	\$276.25
Service	03/31/2022	In-depth review of first Lopez report narrative.	1.50	\$325.00	\$487.50
Service	04/01/2022	Continue review of Lopez Rpt. 1 for purpose of preparing opening statement.	1.00	\$325.00	\$325.00
Service	04/01/2022	Conduct in-depth review of materials while preparing notes for opening statement: Lopez Report attachments (1.7); Response to motion for summary judgment (.3) Court's SJ order (.2); Timeline of Major events (.20).	2.40	\$325.00	\$780.00
Service	04/01/2022	Conduct in-depth review of the following for purpose of preparing opening statement and cross examinations while contemporaneously taking notes on key points: - Statements taken by Lopez Lt. Brazil (1.8); - Multiple reviews of retaliation memo by Lt. Lopez (.4); - memoranda prepared by counsel regarding timeline of relevant events (.2).	2.40	\$325.00	\$780.00
Service	04/01/2022	Conduct review of remainder of exhibits.	2.90	\$325.00	\$942.50
Service	04/02/2022	Conduct in-depth review of numerous exhibits, jury charge, and statements while outlining opening statement rules and story (2.0). Telephone conference with co-counsel regarding opening statement strategy (.50).	2.50	\$325.00	\$812.50
Service	04/02/2022	Brainstorm on and craft opening rule statements (1.0) Begin preparation of powerpoint for opening (1.2).	2.20	\$325.00	\$715.00
Service	04/03/2022	Conduct in-depth review of the Court's summary judgment order and continue structuring opening statement using powerpoint and timeline.	0.50	\$325.00	\$162.50
Service	04/04/2022	TC w Lead co-counsel re motions in limine and damages for all troopers (40). Conduct in-depth review of summary judgment order while contemporaneously preparing damages section of opening statement (1.60)	2.00	\$325.00	\$650.00
Service	04/04/2022	Editing retaliation section of opening statement (.30). Editing damages section of opening statement (.90).	3.10	\$325.00	\$1,007.50

		Zoom call with Mahan, Barton, Riggins to prepare trial testimony (1.90).			
Service	04/05/2022	Continue preparing Opening statement PowerPoint and analyzing effective visuals.	0.20	\$325.00	\$65.00
Service	04/05/2022	In-depth review of verdict form and jury instructions (.20)	1.70	\$325.00	\$552.50
		Further refining of rule statements (.50)			
		Continue crafting opening statement section relating to causation, adverse personnel action, and false reasons for transfer (1.0)			
Service	04/05/2022	Further preparation of opening statement pertaining to undermining anticipated defenses.	2.10	\$325.00	\$682.50
Service	04/07/2022	Telephone conference with Riggins for purpose of preparing harms/losses section of opening (1.1)	2.30	\$325.00	\$747.50
		Telephone conference with Mahan for purpose of preparing harms/losses section of opening (1.2)			
Service	04/08/2022	Conduct in-depth review of Brazil statements and document production regarding Barton, Jr.'s first report. (.60)	2.50	\$325.00	\$812.50
		Make changes to opening statement based on the same (1.0).			
		Prepare section of opening statement pertaining to excuses given by defense for adverse employment actions (.90).			
Service	04/09/2022	Conduct in-depth review of Lopez reports and statements taken during investigation while contemporaneously preparing bad acts memo for trial team.	2.10	\$325.00	\$682.50
Service	04/11/2022	Conduct in-depth review of Currie report and affidavit while simultaneously preparing cross-exam of Currie (1.1)	4.20	\$325.00	\$1,365.00
		Conduct in-depth review of lengthy Major Truett affidavit re retaliation (1.5).			
		Prepare bad acts memo to aid in preparing opening statement (1.6).			
Service	04/12/2022	Conduct in-depth review of all Truett statements while contemporaneously preparing cross examination of Truett.	4.50	\$325.00	\$1,462.50
				Total	\$13,308.75

Please make all amounts payable to: Ben Newman Attorney at Law, PLLC

Please pay within 30 days.